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**Sent:** Thursday, February 15, 2018 4:38 PM

**To:** disb@deltacouncil.ca.gov>

**Subject:** Comments on Draft Water Quality Science in Delta - Chemical Contaminants and Nutrients

Dear Delta Independent Science Board,

Thank you for the opportunity to comment on the December 12, 2017, draft document "Water Quality Science in the Sacramento-San Joaquin Delta, Part 1: Chemical Contaminants and Nutrients". These written comments are in follow-up to the oral comments I provided at the February 2, 2018, Delta Independent Science Board (Delta ISB) meeting.

Metropolitan Water District of Southern California (Metropolitan) supports the written comments submitted by the State and Federal Contractors Water Agency. We have one additional comment concerning the findings in the draft report.

Metropolitan is concerned with the report finding #4 on page 3 (lines 21-25), and recommends that the finding statement be revised to more accurately reflect the role of State and federal water contractors in water quality monitoring, and to focus on the need to develop a more comprehensive and broadly supported and funded water quality monitoring and research program.

While the State and federal water contractors do contribute substantial resources to water quality monitoring and research through the Interagency Ecological Program, DWR's Environmental Monitoring Program, DWR's Municipal Water Quality Investigations Program and the State and Federal Contractors Water Agency, they are not the "primary" funders of water quality monitoring and research for chemical contaminants and nutrients. For example, programs administered by the Central Valley Regional Water Quality Control Board, such as the Delta Regional Monitoring Program and discharge permit compliance monitoring programs also provide substantial resources for water quality monitoring and research.

Metropolitan is also concerned about the second part of the finding statement that states "Projects that would divert more water upstream of the Delta could make these investments to protect in-Delta water quality a lower priority", and with similar statements on page 8 of the draft report. These statements are not accurate and are not supported by any information in the draft report. These statements are also not helpful to encourage a productive dialogue among stakeholders regarding how to do more effective water quality monitoring in the future.

The proposed California WaterFix project is a dual conveyance project that continues to include water supply exports from the south Delta facilities, so it is puzzling that one would assume that the State and federal water contractors would provide fewer resources for water quality monitoring. The water contractors will remain interested and concerned about Delta water quality conditions. With the California WaterFix project there will still be all the D-1641 compliance water quality monitoring requirements in the Delta, as amended by the State Water Resources Control Board for the California WaterFix permit. The California WaterFix project also includes an adaptive management program that includes additional monitoring requirements in the Delta.

Metropolitan is interested in water quality conditions in the Delta as part of a healthy ecosystem, and through our own science program and efforts of the associations we are members of, such as the State and Federal Contractors Water Agency, we support monitoring and studies, and will continue to do so. Given all these points, State and federal contractor support for water quality monitoring and science is not expected to decrease.

Sincerely,

Lynda Smith

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